

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

EFRAIN ROMERO-GARCIA, as father
and statutory next-of-kin of Efrain Romero de
la Rosa,

Plaintiff,

v.

CORECIVIC, INC.,

Defendant.

Civil Action No. 4:20-cv-00158-CDL

PARTIES' NOTICE REGARDING ESI DISCOVERY

Efrain Romero-Garcia (“Plaintiff”) and CoreCivic, Inc. (“CoreCivic”) (collectively, the “Parties”), through their respective counsel and in accordance with the Court’s Order (Doc. 72), have agreed to a protocol (“Protocol”) governing CoreCivic’s collection and production of electronically stored information (“ESI”), which Protocol provides applicable search terms, custodians, applicable time periods for collection, and an agreed-upon date for CoreCivic’s substantial completion of its ESI production to Plaintiff, and therefore provides notice to this Court as follows.

First, the Parties have, as of this same date, filed their Joint Motion and Stipulation for Order Controlling Discovery of Electronically Stored Information. Second, the Parties have agreed upon the Protocol, which provides ESI search terms, custodians, and applicable time periods for collection. Third, CoreCivic has agreed to substantially complete its ESI production by July 6, 2022. Finally, the Parties agree that should Plaintiff believe that discovery warrants either a subsequent enlargement of the collection or additional and/or modified search terms, the parties will initially meet and confer regarding same. By such agreement, neither Party waives

its rights to request further discovery or object to same (as applicable), and if necessary, seek appropriate relief from the Court if the Parties reach an impasse regarding any further modification of the Protocol.

Accordingly, the Parties do not presently have any discovery disputes regarding CoreCivic's collection and production of ESI discovery.

Dated: May 25, 2022

Respectfully submitted,

s/ Rachel Love
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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of May, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

N/A

s/ Rachel Love